

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

JONATHAN REES, a/k/a GREG ELLIS,  
a/k/a JONNY REES,

Defendant.

Case No.: 3:23-CV-1352 (TJM/ML)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the Declaration of Kenneth A. Caruso, and the accompanying Memorandum of Law, Plaintiff, Jane Doe (“Plaintiff”), will move this Court, at the U.S. Courthouse, 15 Henry Street, Binghamton NY 13901, on December 20, 2024, for an order, modifying the Court’s previous Order, ECF 71, and allowing Plaintiff to serve her motion for a default judgment upon Defendant by alternative means, and granting such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to N.D.N.Y. Local Rule 7.1(a)(1), papers in opposition to this motion must be filed on or before December 13, 2024.

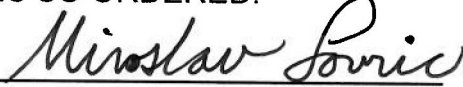
Dated: November 22, 2024  
New York, New York

Respectfully Submitted,

KENNETH CARUSO LAW LLC

By: /s/ Kenneth A. Caruso  
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IT IS SO ORDERED:

  
Miroslav Lovric  
U.S. Magistrate Judge

Dated: December 2, 2024  
Binghamton, NY

LABKOWSKI LAW, P.A.

By: /s/ David Labkowski  
David Labkowski

250 95th Street, Unit #547233  
Surfside, Florida 33154  
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*Attorneys for Plaintiff,  
Jane Doe*